

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETERSEN ENERGÍA INVERSORA, S.A.U.
and PETERSEN ENERGÍA, S.A.U.,

Plaintiffs,

-against-

ARGENTINE REPUBLIC and YPF S.A.,

Defendants.

No. 15 Civ. 2739 (LAP)

ETON PARK CAPITAL MANAGEMENT,
L.P., ETON PARK MASTER FUND, LTD.,
and ETON PARK FUND L.P.,

Plaintiffs,

-against-

ARGENTINE REPUBLIC and YPF S.A.,

Defendants.

No. 16 Civ. 8569 (LAP)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on September 29, 2020, the Court entered a protective order governing disclosure in the above-referenced actions (the “**Protective Order**”) (Dkts. 177 and 124), the defined terms of which are adopted and used herein except as may be otherwise noted; and

WHEREAS, Burford Capital LLC (“**Burford**”), plaintiffs Petersen Energia Inversora, S.A.U., Petersen Energia, S.A.U., Eton Park Capital Management, L.P., Eton Park Master Fund, Ltd., and Eton Park Fund, L.P. (“**Plaintiffs**”), and defendants the Republic of Argentina and

YPF S.A. (“**Defendants**,” and together with Burford and Plaintiffs, the “**Parties**”) wish to supplement the Protective Order with additional terms to which the Parties have agreed;

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the Parties that:

1. Burford may designate its Confidential communications with auditors and regulators as “Outside Counsel Only.”
2. Documents shall be designated “Outside Counsel Only” as set forth in Paragraph 5 of the Protective Order, except that the Producing Party shall also affix the words “OUTSIDE COUNSEL ONLY” on the document.
3. Documents designated “Outside Counsel Only” shall not be disclosed by any Receiving Party to anyone other than the categories of persons identified in subparagraphs 7(a) (except in-house counsel), 7(c)-7(f), 7(g) (limited to use during deposition testimony and trial testimony), 7(h)-(j), and 7(l) of the Protective Order. Notwithstanding the foregoing and for the avoidance of doubt, Documents designated “Outside Counsel Only” shall not be shared with the categories of persons identified in subparagraph 7(b), including in-house attorneys employed by a Party.
4. Documents designated “Outside Counsel Only” shall be afforded all protections applicable to, and other than with respect to disclosure pursuant to paragraph 3 above, treated in the same manner as, documents designated Confidential under the Protective Order.

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SO ORDERED:

This ____ day of April, 2021

Hon. Loretta Preska
United States District Judge